

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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FEDERAL HOUSING FINANCE AGENCY, etc.,	:	
Plaintiff,	:	
v.	:	11 Civ. 5201 (DLC)
UBS AMERICAS, INC., et al.,	:	
Defendants.	:	
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FEDERAL HOUSING FINANCE AGENCY, etc.,	:	
Plaintiff,	:	
v.	:	11 Civ. 6188 (DLC)
JPMORGAN CHASE & CO., et al.,	:	
Defendants.	:	
-----	X	
FEDERAL HOUSING FINANCE AGENCY, etc.,	:	
Plaintiff,	:	
v.	:	11 Civ. 6189 (DLC)
HSBC NORTH AMERICA HOLDINGS, INC., et al.,	:	
Defendants.	:	
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FEDERAL HOUSING FINANCE AGENCY, etc.,	:	
Plaintiff,	:	
v.	:	11 Civ. 6190 (DLC)
BARCLAYS BANK PLC, et al.,	:	
Defendants.	:	
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FEDERAL HOUSING FINANCE AGENCY, etc.,

Plaintiff,

v.

DEUTSCHE BANK AG, et al.,

Defendants.

FEDERAL HOUSING FINANCE AGENCY, etc.,

Plaintiff,

v.

FIRST HORIZON NATIONAL CORP., et al.,

Defendants.

FEDERAL HOUSING FINANCE AGENCY, etc.,

Plaintiff,

v.

BANK OF AMERICA CORP., et al.,

Defendants.

FEDERAL HOUSING FINANCE AGENCY, etc.,

Plaintiff,

v.

CITIGROUP INC., et al.,

Defendants.

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11 Civ. 6192 (DLC)

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11 Civ. 6193 (DLC)

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11 Civ. 6195 (DLC)

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11 Civ. 6196 (DLC)

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FEDERAL HOUSING FINANCE AGENCY, etc.,

Plaintiff,

v.

GOLDMAN, SACHS & CO., et al.,

Defendants.

FEDERAL HOUSING FINANCE AGENCY, etc.,

Plaintiff,

v.

CREDIT SUISSE HOLDINGS (USA), INC., et al.,

Defendants.

FEDERAL HOUSING FINANCE AGENCY, etc.,

Plaintiff,

v.

NOMURA HOLDING AMERICA, INC., et al.,

Defendants.

FEDERAL HOUSING FINANCE AGENCY, etc.,

Plaintiff,

v.

MERRILL LYNCH & CO., INC., et al.,

Defendants.

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11 Civ. 6198 (DLC)

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11 Civ. 6200 (DLC)

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11 Civ. 6201 (DLC)

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11 Civ. 6202 (DLC)

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NOTICE OF RULE 30(b)(6) DEPOSITION

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and the Order Regarding Deposition Protocol entered by the Court in the above-captioned actions, Defendants will take the deposition upon oral examination of Plaintiff Federal Housing Finance Agency, in its capacity as Conservator for the Federal Home Loan Mortgage Corporation, at 9:00 am on January 31, 2013, at the offices of Skadden, Arps, Slate, Meagher & Flom LLP, Four Times Square, New York, New York, 10036, through a designated person who must testify about information known or reasonably available to the organization concerning the topics listed in Schedule A hereto.

PLEASE TAKE FURTHER NOTICE that the deposition will take place before a notary public or other officer authorized to administer oaths and record testimony pursuant to Rule 28 of the Federal Rules of Civil Procedure, and will be recorded by stenographic means and videotape.

Date: January 11, 2013

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SCHEDULE A

DEFINITIONS AND INSTRUCTIONS

1. The Uniform Definitions in Discovery Requests and rules of construction set forth in Rule 26.3 of the Local Civil Rules of the United States District Court for the Southern District of New York (“Local Civil Rules”) shall apply.

2. The term “Actions” means the above-captioned civil actions pending in the United States District Court for the Southern District of New York.

3. The term “Complaints” means the operative complaints in the Actions, individually and collectively, and all exhibits and appendices thereto.

4. The term “Defendants” refers to all defendants named in the Actions.

5. The term “Freddie Mac” means the Federal Home Loan Mortgage Corporation and all current and former officers, directors, employees, attorneys, and agents thereof.

6. The term “Agent” means any individual or entity that acted on behalf of Freddie Mac, at Freddie Mac’s request, or collected information or performed activities the results of which were ultimately provided to Freddie Mac.

7. The term “Securitizations” refers to each and every securitization, individually and collectively, referred to in the Complaints.

8. The term “Certificates” refers to each and every certificate, individually and collectively, referred to in the Complaints.

9. The term “Freddie Mac Certificates” means the particular Certificates, individually and collectively, that Freddie Mac purchased in the Securitizations.

10. The term “Mortgage Loans” means any residential first or second lien mortgage loan, individually and collectively.

11. The term “Certificate Mortgage Loans” means the Mortgage Loans that were in a group or pool that directly backed any of the Freddie Mac Certificates at the time of the closing of a Securitization or thereafter, individually and collectively.

12. The term “RMBS” refers to securities, options, credit default swaps, or other derivatives (including synthetic investments) backed by or referencing Mortgage Loans, individually and collectively.

13. The term “PLS” refers to RMBS issued by private entities and not guaranteed by Fannie Mae, Freddie Mac, or other government issuers or government-sponsored entities. This includes the Freddie Mac Certificates.

14. The term “Freddie Mac-issued RMBS” refers to RMBS issued by Freddie Mac.

15. The term “Credit Rating Agencies” refers to any individual or entity involved in any way with the provision of credit ratings for RMBS, including Standard & Poor’s, Moody’s Investor Service, and Fitch Ratings.

16. The term “Issuer” refers to any entity that issued any PLS purchased by Freddie Mac, or any PLS Freddie Mac considered purchasing, during the relevant time period.

17. The term “Underwriter” refers to any entity that underwrote any PLS purchased by Freddie Mac, or any PLS Freddie Mac considered purchasing, during the relevant period.

18. The term “Trustee” refers to the administrator of each Trust enumerated in each of the Complaints.

19. The term “Originator” refers to any entity that originated or issued any of the Certificate Mortgage Loans, including all “Non-Party Originators” referred to in the Complaints and including all current and former officers, directors, employees, attorneys, and agents thereof.

20. The term “Servicer” refers to any entity that serviced any of the Certificate Mortgage Loans, including all “Non-Party Originators” referred to in the Complaints and including all current and former officers, directors, employees, attorneys, and agents thereof.

21. The term “Diligence Provider” refers to any entity that provided diligence services relating to the Certificates, Securitizations, Mortgage Loans, or as referenced in the Complaints, including all current and former officers, directors, employees, attorneys, and agents thereof.

22. The term “Counterparties” refers to Originators, Underwriters, Issuers, Servicers, Credit Rating Agencies, Trustees, Diligence Providers, and all other individuals or entities involved in any way with the creation, issuance, sale, retention, purchase or review of Mortgage Loans or RMBS.

23. The term “Offering Materials” refers to registration statements, preliminary and final prospectuses, prospectus supplements, term sheets, presentations, summaries, reports, and any other preliminary or final document used to market, solicit, or otherwise describe the Certificates or Securitizations to certificateholders or potential certificateholders.

24. The term “Housing Goals” means any periodic goals, subgoals or targets applicable to Freddie Mac set by any government entity, agency or department, or by law, regulation, directive, or guidance, including by the United States Department of Housing and Urban Development, designed to expand housing opportunities among targeted areas, communities, or demographic groups, directly or indirectly, including goals relating to borrower identity, borrower income, borrower debt, geographic region, volume of loans, number of loans, or aggregate principal balances of loans.

25. The term “Charter” refers to any law, regulation, directive, or guidance governing Freddie Mac, including the Federal Home Loan Mortgage Corporation Act.

26. The term “include,” or any variant thereof, means including without limitation.

27. The terms “relating to,” “concerning,” “regarding,” and “reflecting,” and any variant thereof, mean relating to, regarding, concerning, referring to, with respect to, reflecting, describing, involving, evidencing, pertaining to, containing, setting forth, showing, disclosing, or constituting.

28. Unless otherwise specified, the time period covered by each topic is from June 30, 2004 through the present.

29. The use of any definition for the purposes of this Notice shall not be deemed to constitute an agreement or acknowledgment on the part of Defendants that such definition is accurate, meaningful, or appropriate for any other purpose in the Actions.

TOPICS

1. Freddie Mac's review, analysis, recommendation, due diligence, and purchase of PLS, including the factors considered in connection with any such activity; the identities and extent of involvement of all business units, committees, employees and Agents involved with any such activity, and the extent of the approval authority of each; the applicable policies, procedures and guidelines related to any such activity; and the periodically generated documents and reports related to any such activity.
2. The extent to which any business unit, committee, employee or Agent involved with review, analysis, recommendation, due diligence, or purchase of PLS was also involved with review, analysis, recommendation, due diligence, purchase or securitization of Mortgage Loans, and the nature of such involvement.
3. The extent to which loan-to-value ratios, owner-occupancy percentages, adherence to underwriting guidelines, or any representations in any Offering Materials were considered by Freddie Mac in determining whether to purchase any PLS, including the identities and extent of involvement of all business units, committees, employees and Agents involved in the consideration of any such information; the policies, procedures, and guidelines relating to the consideration of any such information; and the periodically generated documents and reports related to any consideration of such information.
4. The investment guidelines pertaining to Freddie Mac's purchase, retention, or sale of PLS, including the identities and extent of involvement of all business units, committees, employees and Agents involved with formulating any such investment guidelines; the policies, procedures, and practices relating to any such investment guidelines; and the periodically generated documents and reports related to any such investment guidelines.
5. The metrics and models used by Freddie Mac in determining whether to purchase, retain, or sell any PLS, including : the factors, data, or characteristics (collectively, the "factors") – including the sources of such factors – input into any such metric or model; any modifications made to any such metric or model; the identities and extent of involvement of all business units, committees, employees and Agents that played any role in creating, maintaining, modifying or using any such metric or model or recommending use of any such metric or model; and the policies, procedures, and guidelines applicable to the creation, maintenance, modification or use of any such metrics or models.¹
6. The nature and extent of Freddie Mac's monitoring or surveillance activity related to PLS, including the identities and extent of involvement of all business units, committees, employees and Agents involved with any such activity; the nature of any such activity; the

¹ Metrics or models covered by this Topic include: DEFCAP, TAC, OAS, Intex, ROE Analysis, Mortgage Pricer, Lender Performance WorkStation, and REO Analysis, and any other metric or model used to project potential losses or potential returns.

applicable policies, procedures, and guidelines related to any such activity; and the periodically generated documents or reports related to any such activity.

7. Freddie Mac's review, monitoring, and evaluation (collectively, "reviews") of economic data (e.g., the housing market, housing price index, real estate trends, interest rates, and CDO or credit default swap markets) relevant to the decision to purchase, retain, or sell RMBS or Mortgage Loans purchased by Freddie Mac, including the nature of such data; the identities and extent of involvement of all business units, committees, employees and Agents responsible for any such reviews; the policies, procedures, and guidelines related to any such reviews; the manner in which such reviews were input or incorporated into the models described in Topic 5; the periodically generated documents and reports related to such reviews; and the manner in which the results of any such reviews were distributed within Freddie Mac.
8. The nature and extent of due diligence conducted by Freddie Mac in connection with Freddie Mac-issued RMBS and Freddie Mac's purchase of Mortgage Loans, including the identities and extent of involvement of all business units, committees, employees and Agents involved with any such due diligence; the policies, procedures, and guidelines relating to any such due diligence; and the periodically generated documents and reports related to any such due diligence.
9. The manner and extent to which Housing Goals, Charter, and regulatory requirements (collectively, the "regulatory requirements") were considered by Freddie Mac in connection with the purchase of any PLS, including the nature of any such regulatory requirements; the identities and extent of involvement of all business units, committees, employees and Agents involved with evaluating, complying with, fulfilling, or communicating with government agencies regarding any such regulatory requirements; the policies, procedures, or guidelines relating to any such regulatory requirements; the periodically generated documents or reports related to any such regulatory requirements; and the manner in which the purchase of PLS fulfilled any such regulatory requirements.
10. Risk management functions within Freddie Mac, including the identities and extent of involvement of all business units, committees, employees and Agents that had risk management functions; the applicable policies, procedures, and guidelines relating to any such risk management; and the periodically generated documents and reports related to any such risk management.
11. The nature and extent of risks and potential risks to Freddie Mac in purchasing PLS, including the identities and extent of involvement of all business units, committees, employees and Agents with any responsibility related to any such risks; the periodically generated documents and reports related to any such risks; and all actions taken by Freddie Mac to identify, reduce, or address any such risks.
12. The nature, timing, and extent of all decisions by Freddie Mac to enter into or increase exposure to subprime or Alt-A RMBS or Mortgage Loans, including the identities of all business units, committees, employees and Agents with responsibilities related to such

decisions; the development of any policies or procedures with respect to such decisions; and all documents and reports generated in connection with such decisions.

13. With respect to each of the Freddie Mac Certificates, the identity of the individuals who reviewed or relied upon any allegedly misleading Offering Materials, and authorized or made the decision to purchase.
14. The nature and extent to which Freddie Mac believed that the Certificate Mortgage Loans, or Mortgage Loans purchased or securitized by Freddie Mac did not comply with Originators' underwriting guidelines or that information provided about such Mortgage contained inaccurate loan-to-value ratios or misstatements regarding occupancy status, including the identity of each business unit, committee, employee and Agent with such belief, the date on which each first acquired such belief, and any actions taken or required to be taken as a consequence of such belief.
15. Freddie Mac's accounting treatment of the Freddie Mac Certificates (*e.g.*, accounting decisions made pursuant to FAS 115, mark-to-market requirements, and impairment determinations), including the identities and extent of involvement of all business units, committees, employees and Agents that had any involvement with such accounting treatment; the applicable policies, procedures, and guidelines; and the periodically generated documents and reports related to any such accounting treatment.
16. The review, evaluation, and approval or disapproval (collectively "reviews") of Counterparties involved with RMBS or the purchase of Mortgage Loans by Freddie Mac, including the identities and extent of involvement of all business units, committees, employees and Agents involved in any such reviews; the factors used to determine whether to conduct any review of any such Counterparty; the metrics used in any such review; the policies, procedures, and guidelines relating to any such reviews; the periodically generated documents and reports related to any such reviews; and the manner in which the results of any such reviews were distributed within Freddie Mac.
17. Freddie Mac's hedging activity relating to RMBS or Mortgage Loans purchased by Freddie Mac, including the identities and extent of involvement of all business units, committees, employees and Agents involved with any such activity; the nature of such activity; the criteria considered to determine whether to conduct any such activity; the policies, procedures, and guidelines relating to any such activity; and the periodically generated documents and reports related to any such activity.
18. Freddie Mac's knowledge of, and participation in, Originator, Issuer and Underwriter diligence practices, including the identities and extent of involvement of all business units, committees, employees and Agents with responsibilities for acquiring any such knowledge; the policies, procedures, and guidelines relating to acquiring any such knowledge; the periodically generated documents and reports related to any such diligence practices; and the extent to which such knowledge affected Freddie Mac's decisions to purchase any of the Freddie Mac Certificates.

19. The nature and extent of all communications between Freddie Mac and any of the Defendants or Originators concerning the Freddie Mac Certificates, including the identities and extent of involvement of all business units, committees, employees or Agents involved with any such communications; and policies, procedures and guidelines relating to any such communications.
20. Freddie Mac's analysis of, or communication related to Credit Rating Agencies' methodologies for rating RMBS, including the identities and extent of involvement of all business units, committees, employees and Agents involved with any such activity; the applicable policies, procedures, and guidelines related to any such activity; and the periodically generated documents and reports related to any such activity.
21. The nature and extent of all evaluations of any losses suffered by Freddie Mac arising from its purchase of RMBS or Mortgage Loans, including the identities and extent of involvement of all business units, committees, employees and Agents involved in any such evaluation; the content of any such evaluation; the documents and reports generated in connection with any such evaluation; any communication with the Trustee of any of the Freddie Mac Certificates related to any such evaluation; and the dates upon which such evaluations began.
22. With respect to all employees directly or indirectly involved with review, analysis, recommendation, due diligence, and purchase of PLS, the nature and extent of any relationship between compensation of all such employees and the characteristics of the Certificate Mortgage Loans, including applicable policies, procedures and guidelines concerning such relationship.
23. Freddie Mac's knowledge of Originator underwriting and appraisal practices, including the identities and extent of involvement of all business units, committees, employees and Agents with responsibilities for acquiring or disseminating any such knowledge; the policies, procedures, and guidelines relating to Originator underwriting and appraisals practices; and the periodically generated documents and reports related to any such Originator underwriting or appraisal practices.
24. The extent to which Freddie Mac's board of directors and senior management were involved in, informed of, or approved policy-making or decision-making related to PLS, including the identities of the board or management committees responsible, and the extent of each of their responsibilities; and the policies, procedures, and guidelines related to such responsibilities.
25. With respect to each document custodian designated by Freddie Mac, whether and to what extent that custodian's emails or electronic documents were deleted or otherwise rendered unavailable prior to the commencement of these Actions, as a result of the implementation of auto-deletion policies, the overwriting of back-up tapes, the destruction of custodial files following an employee's departure from Freddie Mac or otherwise, the date of such destruction, to the extent known, the subject matter of such unavailable emails or electronic documents, and the nature and extent of any efforts undertaken to recover and identify responsive documents (electronic or otherwise) for that period and custodian.